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November 19, 2016

VIA ECF

Honorable Sandra L. Townes
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Jamese Valme v. The City of New York, et al.
Case No.: 14-cv-6991

Your Honor:

I am attorney for the plaintiff in the above action. I write in response to defendants letter seeking a motion schedule beginning in January. I was unable to respond to defendants email as she first emailed me regarding this issue Friday afternoon at approximately 3 PM.

As I understand from defendants' pre motion letter, the only issue the City seeks to address in its motion is plaintiff pre arraignment delay claims, both state and federal. I believe this issue could be handled as follows:

Defendants Motion due December 5.

Plaintiff's Opposition due December 19.

Defendants Reply due January 5.

Thank you for your consideration.

Very Truly Yours:

/s
David Zelman, Esq.